

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: William C. Offley, and Mary L. Offley,	:	Bankruptcy Case No.: 18-20195-CMB
	:	
	:	Chapter 13
	:	
Debtor.	:	
Ronda J. Winnecour,	:	Document No.: 123
Chapter 13 Trustee	:	
Movant,	:	Related to Document No.: 118, 119
	:	
v.	:	
	:	
William C. Offley, and	:	
Mary L. Offley,	:	
	:	Hearing Date and Time:
	:	April 20, 2023 at 1:30 p.m.
Respondents.	:	

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes Debtors, William C. Offley and Mary L. Offley, by and through their undersigned Counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and file this Response to Trustee's Motion to Dismiss, and represent as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Debtor is without knowledge or information to form a belief as to the truth or falsity of paragraph 4.
5. Paragraph 5 is admitted.
6. Debtor is without knowledge or information to form a belief as to the truth or falsity of paragraph 6.

7. Paragraph 7 is a statement, thus does not require a response. To the extent a response is required, the same is denied.

8. Paragraph 8 is denied. By way of further response, Debtor remitted two payments of \$2,275.00 and \$2,275.00 on March 13, 2023 and March 24, 2023, respectively, and will make additional payments to cure arrears as soon as practicable. Furthermore, Debtor lost employment but has continued to work diligently to complete the plan.

WHEREFORE, Debtors respectfully request that the Trustee's Motion to Dismiss be denied.

Respectfully submitted:

Executed on: March 29, 2023

/s/Brian C. Thompson, Esquire
Brian C. Thompson
PA ID: 91197
Thompson Law Group, P.C.
125 Warrendale Bayne Road, Suite 200
Warrendale, PA 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com